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November 1, 2018

Via Electronic Mail (muratore.kim@epa.gov)

Ms. Kim Muratore, Case Developer (SFD-7-5)

U.S. EPA, Region 9

75 Hawthorne Street

San Francisco, CA 94105

Re: CERCLA 104(e) Information Request
Orange County North Basin Study Area, Orange County, California
Ducommun Incorporated

Dear Ms. Muratore:

Please find below and attached, information responsive to the above referenced information request (the "Information Request"), received by Ducommun Incorporated ("Ducommun") on September 20, 2018. We appreciate the courtesies extended to Ducommun by granting an extension to respond to the Information Request until November 2, 2018.

Please note that all supporting documents and attachments can be found in the attached zip file, and are numbered to correspond to the question and footnotes referenced in the responses below.

- 1. State the full name, address, telephone number, email address, and position(s) held by any individual answering any of these questions on behalf of Ducommun Incorporated and its former subsidiary American Electronics, Inc. (f/k/a, American Pacesetter, Inc.) (together, "the Company").**

RESPONSE:

Responses herein are to activities associated with "the Company" after acquisition of American Electronics, Inc. ("AEI") in July 1998. The term "AEI" shall refer to activities before that date not associated with "the Company". The full name, address, telephone number, email, phone number and positions of the individuals responding to these questions on behalf of Ducommun are as follows:

Rajiv Tata
Deputy General Counsel & Corporate Secretary
200 Sandpointe Avenue, Suite 700
Santa Ana, CA 92707
(657) 335-3675
rtata@ducommun.com

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1885 North Batavia Street
Orange, CA 92865
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Dmartin2@ducommun.com

2. Identify the dates the Company, under any of its current or former business structures, owned and/or operated the facility located at 1600 East Valencia Drive/501 S. Acacia Avenue, Fullerton, California (the "Facility").

RESPONSE:

Upon information and belief, AEI began operations at the Facility in approximately 1961 and continued until approximately 1998. Prior to AEI beginning operations at the site, the site was used for agricultural and low-density residential purposes.

On or about July 2, 1998, Ducommun Technologies, Inc. (f/k/a Jay-El Products, Inc.), now known as Ducommun LaBarge Technologies, Inc., acquired all the capital stock of AEI. At the time of acquisition, AEI was principally owned by Mr. Richard F. Holland (now deceased) and Mr. Dominick Monaco. Pursuant to the share purchase agreement, Ducommun Technologies, Inc. received an indemnity for any violations of environmental laws, liabilities arising from environmental laws, soil and groundwater contamination that may have occurred prior to the acquisition from the former principal shareholders, Mr. Holland and Mr. Monaco.

After the acquisition, all operating assets of AEI were distributed to Ducommun Technologies, Inc. and AEI ceased doing business entirely. It is believed that in October 1998, the operating assets of AEI were sold to D/A Pacific, Inc. As such, AEI has no tangible assets of any kind. After the asset sale, Ducommun Technologies, Inc. ceased operating at the Fullerton site and moved operations to Carson, California. The Facility property was then sold to Wohl Investment Company, Inc. in October 2003. Please see the response to Question 14 below.

- 3. Identify the individuals who are or were responsible for environmental matters at the Facility during its operation at this address. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates the individual held such positions.**

RESPONSE:

The person responsible for environmental matters at the Facility between the time of Ducommun Technologies, Inc.'s acquisition of AEI and the time when operations were moved to Carson, CA was Mr. Rob Cowan, who is a current employee of Ducommun (see response to Question 2 above). Mr. Cowan's information is below:

Regional EHS Manager
1885 North Batavia Street
714-921-5309

- 4. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate. This includes individuals whose job functions included operations that utilized or generated hazardous substances, or who were responsible for storing/filling/disposing of hazardous substances and/or wastes containing the above-identified chemicals. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates the individual held such positions.**

RESPONSE:

There are several former AEI employees that still work for Ducommun at the Carson facility performing similar functions as were performed when operations were located at the former AEI facility in Fullerton. Five of these employees were interviewed on October 15, 2018 and none had any information regarding the use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate (hereafter collectively referred to as chemicals of interest or COIs).

There are several former employees that due to their titles may have knowledge of the requested information. Their last known contact information is included below:

Donald Wall, Facility Manager
Dates in position: 5/19/1975 – 9/29/2000
Employee ID 40679
Last known address: 5421 Lakeview, Yorba Linda, CA 92886
Last known phone: 714-777-3871

Craig Zimmerman, Facility manager

Dates in position: 9/18/2000 – 7/8/2016
Last known address: 3721 S Van Ness, Santa Ana, CA 92707
Last known phone: 714-751-5754

See also the response to Question 15 below.

- 5. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below-ground storage tanks. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates the individual held such positions.**

RESPONSE:

The current employees referenced in the response to Question 4 above did not have knowledge of the physical layout and flow of the operations nor of physical features such as clarifiers, degreasers, and above and below ground storage tanks. The former employees referenced in the response to Question 4 may recall such detail.

- 6. Explain the Company's present corporate status (e.g., active, suspended, defunct, merged, dissolved) as well as the operational status (e.g., whether and where business operations are currently occurring).**

RESPONSE:

Ducommun currently operates primarily through its wholly owned subsidiaries, Ducommun Aerostructures, Inc. ("DAS"), Ducommun LaBarge Technologies, Inc. f/k/a Ducommun Technologies, Inc., an Arizona corporation ("DLT-AZ"), and Ducommun LaBarge Technologies, Inc., a Delaware corporation ("DLT-DE"). Additional information regarding each of Ducommun's subsidiaries is set forth below.

DAS was incorporated in Delaware in January, 2004 and conducts operations at facilities located in Cossackie, New York; Parsons, Kansas; Gardena, California; Orange, California; Monrovia, California; and El Mirage, California.

DLT-AZ was incorporated in Arizona in July 2011 and conducts operations in Carson, California; Phoenix, Arizona; Santa Clarita, California; and Huntington Beach, California. As discussed in the response to Question 4 above, DLT-AZ was the successor to Ducommun Technologies, Inc., which was formerly known as Jay-El Products, Inc. If AEI were still an active corporate entity, it would be identified as a subsidiary of DLT-AZ. However, the AEI corporate entity was suspended by the California Franchise Tax Board sometime after November 2006.

DLT-DE was incorporated in Delaware in June 2011 as a result of the merger of DLBMS, Inc. and LaBarge, Inc., and conducts operations in Joplin, Missouri; Tulsa, Oklahoma; Berryville, Arkansas; and Huntsville, Arkansas.

7. Provide the date and in which State the Company was incorporated, formed, or organized.

RESPONSE:

Ducommun Incorporated was originally incorporated in the state of Delaware, in April 1970. Please also see the response to Question 6 above.

8. EPA has identified two companies that operated under the name American Electronics, Inc. at the Facility: 1) American Pacesetter (f/k/a, American Electronics, Inc.), a company incorporated in California in 1945 ("AEI #1) and predecessor to Pacesetter Business Properties; and 2) American Electronics, Inc. (f/k/a, American Pacesetter, Inc.), a company incorporated in California in 1969 ("AEI #2) and the former subsidiary of Ducommun Incorporated. Describe the corporate relationship or other affiliation between AEI #1 and AEI #2, and identify the time period(s) during which the relationship or affiliation existed.

RESPONSE:

Upon information and belief, AEI was incorporated in the State of California on October 7, 1969 under the name American Pacesetter, Inc. ("API"). API changed its name to AEI on June 11, 1970.

9. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates, and identify each business structure under which it existed or operated while at the Facility location. For each business structure and name under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure and name.

RESPONSE:

Please see the response to Question 6 above. Ducommun Incorporated's wholly owned subsidiary, Ducommun Technologies, Inc. (f/k/a Jay-El Products, Inc.) acquired the shares of AEI in 1998. In October 1998, the assets of the AEI business were sold to D/A Pacific, Inc., at which time Ducommun ceased operating at the Fullerton site and subsequently moved operations to the DLT-AZ facility located in Carson, California by December 1998. The Facility property was then sold to Wohl Investment Company, Inc. in October 2003.

- 10. If the Company operated at the Facility as a subsidiary, division, or other business unit, provide this information and identify where it fits into the larger company's structural organization.**

RESPONSE:

Please see the response to Questions 2, 6, and 9 above.

- 11. If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and owners of each fictitious name.**

RESPONSE:

Ducommun does not now, nor did it in the past, operate under a fictitious business name during the three to four months after it acquired the shares of AEI until operations were moved to the Carson, California facility.

- 12. If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company. To the extent you are aware, include any information regarding changes planned by the buyer regarding operations that involve the use, storage, or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate (e.g., plans to add or dismantle clarifiers, change the types of solvents being used).**

RESPONSE:

In approximately October 1998, the assets of the AEI business were sold to D/A Pacific, Inc. at which time Ducommun ceased operating at the Fullerton site and moved operations to Carson, California.

The Facility property was sold to Wohl Investment Company, Inc. in October 2003. The last known contact information for the buyer is: 2402 Michaelson, Suite 170, Irvine, California 92612. The last known contact information for an individual employed by the buyer is: Peter Desforges at (949) 955-0115. Ducommun is not aware of any information regarding changes planned by the buyer regarding operations involving the use, storage, or disposal of any COIs.

- 13. If the Facility was operated by other parties prior to the Company's operations, identify the prior operators and describe those previous operations to the extent known. Describe any changes made to operations by the Company after it began**

operating at the Facility that changed (either increases or decreases) the use or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

RESPONSE:

Upon information and belief, AEI operated at the Fullerton site beginning in 1961. Prior to that time, it is believed that the site was used for agricultural and low-density residential purposes.

According to an internal memorandum, a hazardous material review was conducted at the Facility in December 1998¹. No chlorinated solvents were found to be in use at the Facility at that time.

- 14. For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants or lessees.**

RESPONSE:

Please see the attached August 13, 2003 Schedule of Leases for a list of tenants that occupied the Facility property during the time period between 1998 and 2003 when Ducommun indirectly owned the Facility property through its subsidiaries.

- 15. For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.**

RESPONSE:

The Company operated at the Facility for approximately three to four months in 1998. Upon information and belief, the former principals of AEI were Mr. Richard Holland and Mr. Dominick Monaco. It is further believed that there were approximately seventy two (72) individuals employed by AEI prior to Ducommun's acquisition of AEI. The last known address for Mr. Monaco is Ex. 6 Personal Privacy The last known address for Mr. Holland is Ex. 6 Personal Privacy

- 16. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any products manufactured or services performed at the Facility. Describe any significant change in Facility size, the Company's number of employees, and the products manufactured or services performed over time.**

¹ 12.28.98 Hazardous Materials Review at AEI Fullerton Site

RESPONSE:

Upon information and belief, the site consists of approximately 5.63 acres in an L-shaped pattern and was improved by a two-story structure consisting of approximately 100,000 square feet². Upon information and belief, there were approximately seventy two (72) individuals employed by AEI at the time Ducommun acquired AEI. It is believed that AEI's primary products consisted of the manufacture and sale of actuators, fractional horsepower motors, stepper motors, and resolvers for satellites and other space applications. Upon information and belief, AEI also produced 35mm security cameras, and performed repair and refurbishment services on power supply products sold for the Minuteman missile program.

17. Provide a map of the Facility showing the locations of the buildings and significant features on the property at the time that the Company operated at the Facility. Indicate the locations of any maintenance shops, machine shops, degreasers, clarifiers, plating areas, painting areas, cooling towers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:

- a. Surface structures (e.g., buildings, tanks, containment areas, storage areas);
- b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers);
- c. Stormwater drainage system and sanitary sewer system, including septic tanks and subsurface disposal fields;
- d. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Facility or to the property itself (e.g., excavation work) and the dates on which such changes occurred; and
- e. The location of all waste storage or waste accumulation areas as well as waste disposal areas (e.g., dumps, leach fields, burn pits).

RESPONSE:

An undated map is attached that shows details on structural features as well as operational areas at the Facility³. The map was in Facility files related to the former fuel tank permitting and testing. That tank was removed in October 1994. In addition, there are numerous maps in various investigation reports (see response to Item #22).

a)-c) Please see the map referenced in Footnote 3 for surface and subsurface features known at the Facility.

² See response to Question 24 and the attached August 21, 1990 Phase I Environmental Site Investigation prepared by ATEC Associates, Inc.

³ Undated Fuel Tank Test Map

d) See attached 1992 letter regarding soil excavation and repaving⁴ as well as a Tank Closure Report⁵ for discussion of demolitions and/or changes to structures under the Facility.

e) Waste storage or accumulation areas are not known unless they were the same locations discussed in Item 18 for chemical storage. There is no known waste disposal location at the Facility.

18. Indicate on a map of the Facility or in narrative form each location where any of the following chemicals were used, stored, generated, spilled, or disposed of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate. Describe any manufacturing or treatment processes in which any of these chemicals were used.

RESPONSE:

Ducommun is not aware of specific locations where COIs were used at the Facility.

There were two chemical storage areas known to exist in the southwest of the Facility property but no specific information on what materials were stored or during what timeframes. The locations of the storage areas are shown on various maps and reports including a 1996 Groundwater Monitoring Report⁶.

19. Provide copies, both originals and updates, of hazardous material business plans and chemical inventory forms submitted to city, county, and/or state agencies for the Facility.

RESPONSE:

It appears from a list of hazardous materials in a chemical inventory⁷ that several of the COIs were in use at some point at the Facility. It is not known if this list reflects materials in use at the time the inventory was prepared or if the inventory included materials that were used or approved for use at some point in the past and had not yet been removed from the list.

20. Provide a list of all chemicals and hazardous substances used at the Facility that contained any of the following: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

⁴ 08.18.1992 AEI Letter to CRWQCB

⁵ 01.1995 Tank Closure Report

⁶ 12.16.96 ATC November 1996 Groundwater Monitoring Report

⁷ 12.13.88 AEI Information Request (see Attachment A)

RESPONSE:

For a list of COIs used at the facility, please refer to the Chemical Inventory referenced in the response to Question 19 above.

- 21. For any PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate used at or transported to or from the Facility, identify and provide the following information:**
- a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance;**
 - b. The locations where each chemical or hazardous substance is or was used, stored, and disposed of;**
 - c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste or hazardous substance;**
 - d. The quantity purchased (in gallons) and the time period during which it was used; and**
 - e. Copies of Material Safety Data Sheets for all hazardous substances used.**

RESPONSE:

For a list of COIs used at the facility, please refer to the Chemical Inventory referenced in the response to Question 19.

- 22. Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information related to soil contamination, soil sampling, indoor air sampling, geology, groundwater, surface water, and hydrogeology.**
- a. State whether the information provided represent a complete list of all soil, gas, indoor air, and groundwater sampling conducted at the Facility. If you are aware of any other investigations or sampling reports for which the Company does not have a copy, describe the date and type of sampling conducted, and provide information on where EPA might obtain the report and related documents.**
 - b. State whether the Company is aware of any planned future soil, gas, indoor air, or groundwater sampling at the Facility, and if so, please describe.**

RESPONSE:

The below is a list of Investigation and Sampling reports containing environmental data that Ducommun located in Facility files. Copies are attached to this letter. The documents are separated into two groups: 1) environmental data conducted by the regulatory agency, and 2) investigations conducted by the Company or their representatives. Care should be taken when using the documents in the first category as it appears that the agencies collected and

reported samples from multiple facilities in the same document with their own sample naming conventions and the provided data includes data from other locations not associated with the Facility.

Documents containing environmental data originating from regulatory agencies:

07.15.88 AEI Soil Sample
07.22.88 Petrex Lab Report
08.15.88 Board Data
08.15.90 Board Data
08.16.88 Petrex Lab Report
12.29.89 AEI CRWQCB Subsurface Investigation

Documents containing environmental data originating from the Facility or representatives:

01.08.98 ATC December 1997 Groundwater Monitoring Report
01.20.95 Site Closure for AEI
03.18.92 AGI Additional Subsurface Investigation First Quarterly AEI
03.23.95 Quarterly Vapor Extraction System Progress Report for AEI
05.13.98 Soil Gas Survey Report
06.30.89 Subsurface Investigation Report
08.30.91 Phase II Subsurface Investigation AEI
08.31.95 Closure Investigation for American Electronics Located in Fullerton
08.31.95 CRWQCB Closure Investigation for AEI
10.30.03 Discontinuation of Monitoring and Decommissioning of Wells AEI
11.24.90 Revised Plan of Action AEI Ray Lewis
12.16.96 ATC November 1996 Groundwater Monitoring Report
AEI Well Logs (BP1-BP3 1989)

- c. The above list is a complete list of environmental data of which Ducommun is aware. It is unknown if there was an attempt made in the past to keep a comprehensive library in the Facility files. The regulatory agencies providing oversight over the Facility permitting and remediation may have additional files in their possession.
- d. Ducommun is not aware of any additional planned environmental sampling at the Facility.

23. Identify and provide copies of all agency orders, correspondence, and/or workplans regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was ordered or agreed to be performed, but was never completed. Explain, to the best of your ability, why the sampling was not conducted.

RESPONSE:

Ducommun is not aware of any agency orders, correspondence, or workplans regarding sampling of any media at the Facility that was ordered or agreed to be performed but that

was not completed. To the contrary, Ducommun understands that soil closure letters were issued for the Facility property by the Orange County Health Care Agency⁸ and California Regional Water Quality Control Board – Santa Ana Region (the “Water Board”)⁹. The Water Board did not require further groundwater investigation or remediation at the Facility property and granted a conditional no further action letter for groundwater in 1996. The closure was conditioned on a requirement to continue monitoring four of the eight groundwater wells annually. A letter from the Water Board to AEI and Mr. Peter Desforges of Wohl/Cypress, LLC c/o Wohl Investment Company granted permission to decommission the wells in 2003.

24. Provide copies of any due diligence reports or property transfer assessments related to the Facility.

RESPONSE:

Copies of the following due diligence and/or property transfer assessments related to the Facility are identified below and provided with this information request.

04.27.98 Site Assessment Plus Report
08.21.90 Phase I Environmental Site Assessment AEI
09.19.90 AEI Comments on Phase I Environmental Site Assessment
12.11.96 ATC Environmental Report
01.20.03 Phase I Site Assessment Report by Targhee

25. Identify, and provide the following information for, all groundwater wells located at the Facility:

- a. A map with the specific locations of the groundwater wells;
- b. Dates of well construction;
- c. Depth to groundwater, depth of well, and depth to and of screened intervals;
- d. Uses of each well;
- e. Date each well was abandoned, if applicable;
- f. Date each well was sampled;
- g. All constituents analyzed for during groundwater sampling events; and
- h. All groundwater sampling results, reports of findings, and analytical data.

RESPONSE:

All of the available information requested for the groundwater wells located at the Facility property are provided in investigative reports referenced in the response to Question 22

⁸ 09.26.91 OCHCA Soil Closure Letter

⁹ 04.19.96 RWQCB Soil Closure Letter

above. In particular, the 1996¹⁰ and 1997¹¹ groundwater monitoring reports summarize available monitoring well and analytical data.

26. Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits (e.g., national pollutant discharge elimination system [NPDES] permits).

RESPONSE:

The following documents constitute the copies of AEI permits or permit applications in Ducommun's possession that were associated with the Facility property:

08.03.92 SCAQMD Permit Renewals
09.12.89 LP Gas Tank Inspection Permit Fee
09.04.90 Certificate of Occupancy

Please also see the document provided in response to Question 19 above and the response to Question 28 below regarding a permit for discharge to the sanitation system. No permit was located in Ducommun's files, but the Information Request¹² referred to the Facility permit as No. 2-1-140 and the response to Question 28 provides what appears to be a report or submittal to the sanitation district to comply with that permit.

27. For each waste stream generated at the Facility, identify the waste and describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

RESPONSE:

Please refer to the document provided in response to Question 19. The Information Request¹³ includes copies of manifests for waste hauled from the Facility property. In addition, please see attached the following documents that contain some additional information about AEI waste streams from the Facility property:

09.07.89 Hazardous Waste Inspection AEI
10.18.91 EHS Lab Pack

¹⁰ 12.16.96 ATC November 1996 Groundwater Monitoring Report

¹¹ 01.08.98 ATC December 1997 Groundwater Monitoring Report

¹² 12.13.88 AEI Info Request (see Response to Question 19, footnote 7)

¹³ 12.13.88 AEI Info Request (see Response to Question 19, footnote 7)

The employees referenced in the response to Question 4 recalled generating wipes contaminated with acetone and alcohol as wastes. However, no other waste streams were recalled.

28. If the Company discharged any of its waste stream at the Facility to the sewer, identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.

RESPONSE:

Ducommun is not aware of, nor has in its possession, any information regarding which waste streams discharged to the sewer.

However, we are able to provide the following document that includes AEI analytical data for discharges to the sanitary sewer:

02.01.91 Wastewater Report OCSD

29. Describe the method(s) used by the Company to remove waste streams from sumps at the Facility.

RESPONSE:

Ducommun is not aware of, nor has in its possession, any information about which methods were used by the Facility to remove waste streams from sumps. However, we have attached an AEI document that refers to Facility sumps¹⁴.

30. Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. Identify and provide supporting documentation of:

- a. The date each release occurred;
- b. The cause of each release;
- c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
- d. Where each release occurred and what areas were impacted by the release; and
- e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.

¹⁴ 04.28.87 Memo Clarifiers & Sumps

RESPONSE:

Ducommun is not aware of, nor has in its possession, any information about leaks, spills, or releases at or from the Facility. However, the document referenced in the response to Question 29 appears to be an AEI site investigation memorandum, and a portion of the document intended to document spills was left blank.

31. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

RESPONSE:

Ducommun is not aware of any correspondence with authorities concerning the use, handling, or disposal of COIs at the Facility except as documented in any of the investigation and data reports provided in response to Question 22.

However, please see the attached July 3, 2007 Settlement Agreement (the "Settlement Agreement") between the Orange County Water District (the "OCWD") and AEI¹⁵ wherein AEI issued payment in the amount of Four Hundred Thousand Dollars (\$400,000.00) to resolve "Claims" alleging that AEI activities at the Facility property contributed to the contamination of the groundwater basin and aquifers from which OCWS obtained its water supply. The Settlement Agreement was approved by the Orange County Superior Court on July 5, 2007¹⁶. The term "Claims" includes past and future damages whether known or unknown to the OWCD concerning the Facility.

We trust the above responses to the Information Request and supplemented by the attached supporting documentation adequately satisfies Ducommun's obligations. Please do not hesitate to contact the undersigned with any additional questions relating to this response.

Very truly yours,



Rajiv A. Tata
Deputy General Counsel

Enclosures

¹⁵ 07.03.07 Settlement Agreement

¹⁶ 07.05.07 Settlement Order